

John A. Chartier

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3 UNITED STATES DISTRICT COURT
4 FOR THE DISTRICT OF MASSACHUSETTS
5 Civil Action No. 04-CV-12137 JLT

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7 SUZANNE GENEREUX and BARRY GENEREUX, Individually
8 and as Parents and Natural Guardians of their minor
9 children, ANGELA GENEREUX AND KRISTA GENEREUX,
10 Plaintiffs,

11 v.

12 AMERICAN BERYLLIA CORP., BRUSH WELLMAN, INC., BRUSH
13 WELLMAN CERAMICS, INC., BRUSH WELLMAN CERAMIC
14 PRODUCTS, INC., HARDRIC LABORATORIES, INC., KYOCERA
15 AMERICA, INC., KYOCERA INDUSTRIAL CERAMICS CORP.,
16 and RAYTHEON COMPANY,
17 Defendants.

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19 VIDEOTAPED DEPOSITION OF JOHN A. CHARTIER
20 Tuesday, May 2, 2006, 9:09 a.m. to 3:17 p.m.

21 MURTHA CULLINA

22 99 High Street

23 Boston, Massachusetts

24 Reporter: Marianne R. Wharram, CSR/RPR

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1 person's job duties?

2 A. Not when I first came there, no.

3 Q. You did at some point come to have
4 oversight over him?

5 A. Well, he -- I believe he became ill and
6 either passed away or he left, and then there was
7 another buyer that took over his responsibilities
8 for that commodity.

9 Q. And when you became purchasing manager, you
10 had oversight over that person?

11 A. Yes.

12 Q. Do you remember that person's name?

13 A. Bruce Boulter.

14 Q. Bolter, B-O-L-T-E-R?

15 A. B-O-U-L-T-E-R.

16 Q. How long did Bruce Boulter serve in the
17 capacity of a purchaser for raw materials at
18 Raytheon?

19 A. Probably four or five years.

20 Q. Until sometime in the late 1980's?

21 A. When they broke it apart, when they --

22 Q. Oh, so he stopped doing that when the
23 corporate structure was dissolved?

24 A. Yeah, right. Mm-hmm.

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1 Q. Sitting here today, do you recall the names
2 of any vendors from whom beryllium metal was
3 purchased?

4 A. No, I don't.

5 (Exhibit 18 marked for identification.)

6 Q. Sir, I've put in front of you what has been
7 marked as Exhibit 18. I assume you've probably
8 never seen that before; is that correct?

9 A. I don't recall this, no, even though it's
10 got my name on it.

11 Q. I represent to you this is a Brush Wellman
12 document, and as you notice, your name is on there;
13 is that correct?

14 A. Yes, it is.

15 Q. Do you know what this document pertains to?

16 A. No, I don't. I see the name Hardric and --

17 Q. You see the name Hardric in relation to
18 beryllium rings, correct?

19 A. I see the name Hardric, yes.

20 Q. And the first sentence of this document
21 reads this Raytheon division uses beryllium rings
22 machined by Hardric for electron emitter rings in
23 power tubes. Isn't that what it says?

24 A. That's what it says. I don't know what it

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1 means, but that's what it says. I don't know what
2 an emitter ring is.

3 Q. Do you ever recall having a meeting with a
4 representative from Brush Wellman regarding emitter
5 rings manufactured from beryllium machined by
6 Hardric?

7 A. No, sir.

8 Q. Does this document refresh your
9 recollection as to whether or not Raytheon
10 purchased beryllium materials from Hardric?

11 A. No.

12 Q. Does this document refresh your
13 recollection as to whether Raytheon purchased raw
14 materials, raw beryllium materials, from Hardric,
15 or any other vendor, for that matter?

16 A. Raw beryllium?

17 Q. Yes, beryllium metal.

18 A. No, it does not.

19 Q. Drawing your attention to the second
20 paragraph of this document, it refers to Hardric's
21 financial problems. Do you know what that's
22 referring to?

23 A. Frankly, I don't remember the name Hardric.
24 It just does not ring a bell. Maybe when I leave